



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6

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DALLAS, TX 75202-2733

APR 30 2008

Ms. Susana M. Hildebrand, P.E.  
Director, Air Quality Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

Dear Ms. Hildebrand: *Susana*

We applaud your efforts to engage the Houston/Galveston/Brazoria (HGB) area stakeholders as you move forward with plans to reduce ozone levels in the area. We have reviewed the list of potential control measures provided to the stakeholders. The list is very comprehensive, and we expect it to continue to grow. Thank you for the opportunity provided in your stakeholder process to provide written comments for consideration.

We encourage your agency to implement some of these measures now rather than waiting for the modeling to be complete. The benefits of early adoption of measures, such as the addition of controls included in the June 2007 HGB State Implementation Plan (SIP) submittal, will begin to make a difference in air quality. We realize that there are some procedural constraints in your administrative procedures requiring an open rule to be completed before it can be considered for revision again. Where this conflict can be addressed, we encourage the addition of interim rules in advance of the full attainment demonstration. Some examples of measures that it may make sense to move forward with now in advance of the modeling being completed are:

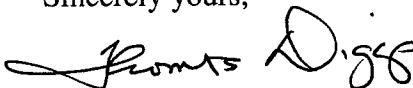
- implementation of additional monitoring of steam and air assist flares especially in highly reactive volatile organic compound service,
- implementation of additional monitoring of flares in general volatile organic compound (VOC) service or other measures to improve the VOC inventory, and;
- additional control of VOC emissions, based on the new U.S. Environmental Protection Agency (EPA) Control Technique Guidelines (CTGs).

The monitoring measures above may make sense to implement now because the results of TXAQS II indicate continued inaccuracies in the VOC inventory. The sooner better information can be collected the sooner it can be incorporated into either a midcourse review for the 1997 ozone standard or plans for the 2008 ozone standard. With regards to the controls associated with EPA's new CTGs, these are measures that are required under the Clean Air Act and will have to be adopted in any case. A list of these new CTGs is enclosed.

We are also aware that you are moving forward with ozone modeling using 2005 and 2006 episodes and are currently conducting refinements after evaluating initial CAMx modeling of these episodes. We appreciate your efforts in communicating information on these efforts to stakeholders through your bimonthly Southeast Texas Photochemical Modeling Technical Committee meetings, which we attend. At this time, we have not received a Draft Modeling and Analysis protocol that will be the basis of the HGB 8-hour SIP attainment demonstration. EPA's guidance indicates the protocol should be the basis for planning and communicating up front how the modeling and analysis will be performed prior to the work being conducted. Please let us know when you expect to be able to share your Draft Modeling and Analysis protocol for our review, and we look forward to working with you on jointly making decisions on the modeling after our evaluation. Our joint goal should be early decisions to avoid delays to your SIP schedule.

Thank you for your work to improve air quality in Texas. We look forward to working with you to further reduce ozone precursor emissions. We also look forward to receiving your Draft Modeling and Analysis protocol for our review. If we can be of further assistance, please call me or have your staff contact Carl Young at (214) 665-6645 or Erik Snyder at (214) 665-7305.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Thomas H. Diggs", written in a cursive style.

Thomas H. Diggs  
Associate Director for Air

Enclosure

Enclosure

Additional Information About Recent  
Control Techniques Guidelines (CTGs)

2006 CTGs (71 FR 58745)

Final Rule: October 6, 2006

Group II product categories:

- Lithographic printing materials
- Letterpress printing materials
- Flexible packaging printing materials,
- Flat wood paneling coatings, and
- Industrial cleaning solvents.

2007 CTGs (72 FR 57215)

Final Rule: October 9, 2007

Group III product categories:

- Paper, film, and foil coatings;
- Metal furniture coatings; and
- Large appliance coatings

Also, final action is planned for Group IV by September 30, 2008  
(a draft CTG will be available at the end of May, 2008).

Group IV product categories:

- Miscellaneous metal products coatings
- Fiberglass boat manufacturing materials
- Miscellaneous industrial adhesives
- Plastic parts coatings
- Auto and light duty truck OEM coatings